## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

## Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Special Counsel for the Debtors

In re:

Supor Properties Enterprises LLC, et al., 1

Debtors.

Chapter 11

Case No. 24-13427 (SLM)

(Jointly Administered)

Judge: Stacey L. Meisel

## **APPLICATION FOR ORDER SHORTENING TIME**

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification numbers are Supor Properties Enterprises (5580), J Supor 136-1 Realty LLC (3205), Supor-172 Realty LLC (5662), Supor Properties Breiderhoft LLC (7258), Supor Properties Devon LLC (6357), Shore Properties Associates North LLC (6707), Supor Properties 600 Urban Renewal, LLC (8604), JS Realty Properties, LLC (2497) and Supor Properties Harrison Avenue LLC (1728).

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The applicant, Michael E. Holt, a member of Forman Holt, proposed attorneys for the

above captioned Debtors, requests that the time period for the for the Debtors' Motion for an

Order Authorizing the Employment and Retention of CBRE, Inc. as Real Estate Broker for the

reason(s) set forth below:

1. The Debtors are filing a motion to approve bidding and sale procedures for the

Debtors real properties with the consent of the Debtors' Lenders consistent with the

Restructuring Support Agreement ("RSA") attached as Exhibit A to the Declaration of Joseph A.

Supor III submitted in support of the Debtors' First Day Motions [Doc. No. 7]. The

implementation of the marketing and sale process is central to the RSA and the retention of

CBRE, Inc. as real estate broker is critical to that process.

2. The Debtor requests that the court schedule a hearing for the earliest possible date

that is convenient for the Court, but no later than April 15, 2024.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

WHEREFORE, the applicant requests entry of the proposed order shortening time.

Dated: April 5, 2024

Respectfully submitted,

FORMAN HOLT

Proposed Attorneys for Debtors

By: /s/ Michael E. Holt

Michael E. Holt